

Zachary P. Takos, Esq., Nevada Bar No. 11293  
**TAKOS LAW GROUP, LTD.**  
1980 Festival Plaza Drive, Suite 300  
Las Vegas, Nevada 89135  
Telephone: 702.856.4629  
Facsimile: 702.924.4422  
Email: zach@takoslaw.com

*Counsel for Dell Financial Services, LLC  
(erroneously named as WebBank)*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ANDREI GRUIA, an individual,  
  
Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,  
LLC, a foreign limited liability company;  
EXPERIAN INFORMATION  
SOLUTIONS, INC., a foreign corporation;  
TRANS UNION, LLC, a foreign limited  
liability company; BARCLAYS BANK  
DELAWARE, a foreign corporation;  
BERLIN-WHEELER, INC., a foreign  
corporation; CAPITAL ONE BANK (USA),  
N.A., a national banking association;  
CHASE BANK USA, N.A., a national  
banking institution; CITIBANK, N.A., a  
national banking institution;  
CONVERGENT OUTSOURCING, INC.,  
a foreign corporation; DISCOVER BANK, a  
foreign corporation; GRANT & WEBER,  
INC., a domestic corporation; NRA  
GROUP, LLC dba NATIONAL  
RECOVERY AGENCY, a foreign limited  
liability company; ONEMAIN FINANCIAL  
SERVICES, INC., a foreign corporation;  
SYNCHRONY BANK, a foreign  
corporation; VERIZON WIRELESS  
SERVICES, LLC, a foreign limited liability  
company; WEBBANK, a foreign  
corporation; WELLS FARGO BANK, N.A.,  
a national banking association;

Defendants.

Case No.: 2-18-cv-02107-JCM-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DELL FINANCIAL  
SERVICES, LLC (ERRONEOUSLY  
NAMED AS WEBBANK) TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

**(SECOND REQUEST)**

1 Plaintiff Andrei Gruia ("Plaintiff") and Defendant Dell Financial Services, LLC (erroneously  
2 named as "WebBank") ("Dell") hereby stipulate and agree that Dell has up to and including March  
3 8, 2019 to respond to Plaintiff's Complaint (ECF No. 1). This will provide Dell additional time  
4 needed to investigate Plaintiff's allegations, to evaluate potential early settlement, and, if needed, to  
5 prepare a response.

6 This is the second request for such an extension. The first request and Court order extended  
7 the time for Dell to respond to February 22, 2019. This stipulation is made in good faith and is not  
8 intended to cause any delay or prejudice any party.

9 **IT IS SO STIPULATED.**

10 DATED this 22<sup>nd</sup> day of February, 2019.

DATED this 22<sup>nd</sup> day of February, 2019.

11 **TAKOS LAW GROUP, LTD.**

**LAW OFFICE OF KEVIN L. HERNANDEZ**

12 /s/ Zachary P. Takos  
13 Zachary P. Takos, Esq., NV Bar No. 11293  
14 1980 Festival Plaza Drive, Suite 300  
Las Vegas, Nevada 89135

/s/ Kevin L. Hernandez  
Kevin L. Hernandez, Esq., NV Bar No. 12594  
8872 S. Eastern Avenue, Suite 270  
Las Vegas, NV 89123

15 *Counsel for Dell Financial Services, LLC*  
16 *(erroneously named as WebBank)*

*Counsel for Plaintiff Andrei Gruia*

17  
18 **IT IS SO ORDERED.**

19  
20   
21 UNITED STATES MAGISTRATE JUDGE

22 DATE: February 26, 2019  
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